



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

MEMORANDUM

September 2, 1999

SUBJECT: Response to Public Comments on the Preliminary Risk Assessments for the Organophosphate Fenamiphos

FROM: Todd Peterson, Chemical Review Manager
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Office of Pesticide Programs

TO: OPP Public Docket for Fenamiphos
Docket # 34134A

This memorandum addresses the public comments that were received in response to EPA's Notice of Availability (63 FR 43175, August 12, 1998) of preliminary risk assessments for the first nine organophosphate chemicals: azinphos-methyl; bensulide; ethion; fenamiphos; isofenphos; naled; phorate; profenofos; and terbufos. (Note: All uses of isofenphos have been voluntarily canceled. See 64 FR 28471, May 26, 1999.) Some of the dockets for these organophosphates received chemical-specific comments and non-chemical-specific comments. The fenamiphos docket only received general or generic comments plus two informational comments as described below. By "non-chemical-specific" we mean that the comment was submitted to the OPP Public Dockets for each of the nine chemicals or for a significant sub-set of the nine. Also, these non-chemical-specific comments generally apply to regulatory or science policy issues that are not unique to any one of the chemicals or risk assessments.

The following sections first describe informational comments that were received for fenamiphos. Second, all other comments are of the non-chemical-specific type indicated above.

Informational Comments

The registrant, Bayer Corporation, submitted a letter that acknowledges receipt of copies of the preliminary risk assessments and reviews the registrant's past and current activities in support of fenamiphos. The letter lists a number of mitigation measures that led to label changes during a period from 1994 to 1996. Other matters cited in the registrant's letter, regarding tolerances or dietary exposure concerns, were addressed as part of the Agency's work when

updating the assessments. This includes addressing issues related to FQPA which became effective in 1996. The registrant concludes by noting this progress on the part of the Agency.

One additional informational document from the Hawaiian Pineapple Growers was received after the docket closed. This document—entitled: Use and Benefits of Fenamiphos on Pineapple in Hawaii—will appear along with the revised risk assessments in the Public Docket.

Non-Chemical-Specific Comments and Responses

Non-chemical-specific comments were received from: American Crop Protection Association; Idaho Farm Bureau Federation; National Coalition Against the Misuse of Pesticides (NCAMP); National Cotton Council; Learning Disabilities Association; Fish and Wildlife Service, Division of Environmental Contaminants; Texas Agricultural Extension Service; Natural Resources Defense Council (NRDC); the Grocery Manufacturers of America, Michigan Agricultural Cooperative Marketing Association; U.S. Apple Association; Southern Professional Fruit Workers Conference (held at Clemson University); and 16 individuals, 13 of whom identified themselves as pest control operators (PCOs) or otherwise associated with the professional pest control industry.

To see a complete description of these comments and the Agency's responses, please refer to Part II (entitled: Non-Chemical-Specific Comments and Responses) of the comment response memo for the organophosphate bensulide. This document is located in the Public Docket #34132 and on the Internet at: <http://www.epa.gov/pesticides/op/bensulide/response.pdf>